

From: [Casey, Carolyn](#)
To: [Craig Ziady](#)
Cc: [Wainberg, Daniel](#); [Bruce Hoskins](#); [Gregory Flaherty](#); [Zucker, Audrey](#)
Subject: RE: Former USM facility, Beverly, MA
Date: Wednesday, October 11, 2017 8:08:00 AM
Attachments: [Oct 6 Approval SAP QAPP 2.pdf](#)

As promised, pdf version attached.

From: Casey, Carolyn
Sent: Friday, October 06, 2017 2:21 PM
To: 'Craig Ziady'
Cc: Wainberg, Daniel ; Bruce Hoskins ; Gregory Flaherty ; Zucker, Audrey
Subject: RE: Former USM facility, Beverly, MA

Please see the attached files. I apologize for the unorthodox method of sending these documents but I have been waiting for IT to fix my scanner and I didn't want to wait any longer. I will send signed pdf documents ASAP. A hard copy to Craig will be in the mail next week.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

casey.carolyn@epa.gov

From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Thursday, October 05, 2017 5:15 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>;
Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Both items are attached. Please return a fully executed Title and Approval page when it is completed.

Thank you.

Craig

Craig J. Ziady

General Counsel

Cummings Properties, LLC

200 West Cummings Park

Woburn, MA 01801

Direct dial: 781-932-7034

Main No.: 781-935-8000

www.cummings.com

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Thursday, October 05, 2017 3:18 PM
To: Craig Ziady
Cc: Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty
Subject: RE: Former USM facility, Beverly, MA

Just to clarify, I was looking for the original unmodified version of the figure for the vocational school. When should I expect this and the QAPP signature page?

From: Casey, Carolyn
Sent: Wednesday, October 04, 2017 4:35 PM
To: 'Craig Ziady' <craig@cummings.com>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA

Thank you for the recent submittals. Could you please scan and email the figure for the Vo Tech school. It was not included in the SAP. Also, please sign the QAPP approval page and email that to me as well. I expect to send out an approval as soon as I get these.

Thanks
Carolyn

From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Friday, September 29, 2017 1:25 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Further to our recent correspondence and as a supplement to our written responses, please find enclosed redlined versions of the QAPP, USM Written Proposal/SAP, and Elliott Landing SAP that reflect the changes made pursuant to EPA's comments. I will forward a link to the full QAPP (766 pages) under separate cover due to its file size.

Please let me know if you have any questions.

Thank you
Craig J. Ziady
General Counsel
Cummings Properties, LLC
200 West Cummings Park
Woburn, MA 01801
Direct dial: 781-932-7034
Main No.: 781-935-8000
www.cummings.com

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Wednesday, September 27, 2017 4:23 PM
To: Craig Ziady; Bruce Hoskins; Gregory Flaherty
Cc: Zucker, Audrey; Wainberg, Daniel
Subject: RE: Former USM facility, Beverly, MA

The timeline for submittals is in the order. The comments were sent by email 9/5. The hard copy was received 9/11 so revised reports were due by 9/25. That being said, an extension until Friday would

be acceptable.

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Wednesday, September 27, 2017 11:05 AM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Bruce Hoskins <BHoskins@FsAssociates.com>; Gregory Flaherty <gxf@cummings.com>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – We were attempting to move this process along most efficiently by not resubmitting all of the reports and simply providing our responses, so they could be incorporated in the reports once EPA approved them. I'm sorry you viewed this as inadequate.

We will revise the documents per your request, but we are not going to be able to finalize them by close of business today. Given that no deadline existed for the comment responses in the first place, they are by no means late. We assume you will not object/disapprove if the documents are submitted by the end of the week.

Please confirm. We will begin working on them today.

With regard to the specific comment you reference, this is specifically addressed in the SOP. Given the number of plans/reports we are submitting, there will, of course, be cross-references to one another, which is what occurred here.

Thank you.

Craig

Craig J. Ziady

General Counsel

Cummings Properties, LLC

200 West Cummings Park

Woburn, MA 01801

Direct dial: 781-932-7034

Main No.: 781-935-8000

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Wednesday, September 27, 2017 10:03 AM

To: Craig Ziady; Bruce Hoskins; Gregory Flaherty

Cc: Zucker, Audrey; Wainberg, Daniel

Subject: FW: Former USM facility, Beverly, MA

Craig, This response is inadequate. It's not possible to complete our review without actually seeing the revisions in context. The response to comments alone is insufficient. I will issue a formal disapproval by the end of the day if the comments have not all been appropriately addressed within the documents and resubmitted by COB today.

Again, a complete review could not be completed but I am passing the following comments along now regarding the Written proposal/SAP North Parcel

This response does not address the second part of the comment asking if more than one sample will be collect at each depth interval. The point being that multiple concrete samples need to be collected at each location for each depth interval in order to collect a sufficient volume to achieve required detection limits. Again, please re-visit the SOPs.

EPA Comment: In the second paragraph on page 24, the discussion of the SOP for

concrete needs to be revisited. The 0-0.05 inch-depth interval does not make sense. Further, it is unclear if only 1 sample would be collected at each depth interval per sample location. If so, this would likely not be a sufficient volume for the laboratory to achieve required detection limits.

Response: *The text has been revised consistent with the STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs) in the QAPP. The 0-0.05 inch depth interval has been eliminated. Intervals to be collected will be 0-0.5 inches and 0.5-1.0 inches.*

Regarding the Elliot Landing SAP and the first comment in the response. This section should clarify what threshold criteria means as stated in the last response from Cummings (It should be clear threshold criteria is not referring to threshold values).

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

casey.carolyn@epa.gov

From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, September 22, 2017 5:52 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>; Zucker, Audrey <Zucker.Audrey@epa.gov>

Subject: RE: Former USM facility, Beverly, MA

Hi Carolyn – Thank you for your most recent set of comments. Please see our responses attached. We have not included final amended documents, as it seems to make sense to finalize the comments first rather than proceed through the exercise of making serial minor revisions to the plans and documents at each stage. We will provide final revised documents promptly following resolution of these final comments.

As always, please let me know if you have any questions.

Thank you.

Best,

Craig

Craig J. Ziady

General Counsel

Cummings Properties, LLC

200 West Cummings Park

Woburn, MA 01801

Direct dial: 781-932-7034

Main No.: 781-935-8000

www.cummings.com

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From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

Sent: Tuesday, September 05, 2017 4:27 PM

To: Craig Ziady

Cc: Zucker, Audrey; Bruce Hoskins; Gregory Flaherty; Wainberg, Daniel; Knox, Rosemary (DEP); Miano, John (DEP)

Subject: RE: Former USM facility, Beverly, MA - redlined documents

Please see attached. A hard copy to follow to Craig only. If others would like one, please let me know.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

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From: Craig Ziady [<mailto:craig@cummings.com>]

Sent: Friday, August 04, 2017 12:35 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>;

Gregory Flaherty <gxf@cummings.com>

Subject: Former USM facility, Beverly, MA - redlined documents

Carolyn - Finally, as a supplement to the full reports sent under separate cover, here are the redline versions of the QAPP, USM Written Proposal, and Elliott Landing SAP.

We did not prepare separate redlines of the QMP or HASP due to the singular changes to those documents.

Please let me know if you have any questions.

Thank you.

Craig

Craig J. Ziady

General Counsel

Cummings Properties, LLC

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Woburn, MA 01801

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